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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 2, 2001

**VIA HAND DELIVERY**

Magalie R. Salas, Esq.

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, S.W., Room TW-B204

Washington, D.C. 20554

703-812-0438

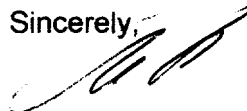
Re: MM Dkt. No. 00-228, RM-9991  
Comments And Counterproposal  
FM Table of Allotments

Dear Ms. Salas:

Transmitted herewith are an original and four copies of Comments And Counterproposal in the above-referenced rulemaking proceeding regarding the FM Table of Allotments.

If questions arise, please contact the undersigned attorney.

Sincerely,



Ann Bavender

Counsel for Reynolds Radio, Inc.

Enclosure

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of

Amendment of Section 73.202(b)

Table of Allotments

FM Stations

(Linden, White Oak, Lufkin, Corrigan,

Mount Enterprise, Pineland, and

Sulphur Bluff, Texas; Zwolle, Louisiana) )

)

MM Docket No. 00-228

)

RM-9991

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To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**COMMENTS AND COUNTERPROPOSAL**

Reynolds Radio, Inc., previously named OARA, Inc. ("Reynolds"), by its attorney, hereby submits its comments and, alternatively, a counterproposal in response to the Notice Of Proposed Rulemaking ("NPRM") released November 9, 2000 in the above-captioned rulemaking proceeding.

**Comments**

In response to a Petition For Rulemaking filed by Reynolds, the NPRM proposed to reallocate Channel 257C2 from Linden, Texas to White Oak, Texas, and modify the permit of KIXK(FM)<sup>1</sup> accordingly, substitute Channel 261C2 for Channel 257C2 at Lufkin, Texas, and modify the license of KUEZ(FM) accordingly, substitute Channel 257A for Channel 261A at Corrigan, Texas, reallocate Channel 260A from Mount Enterprise, Texas to Zwolle, Louisiana, and modify the permit of KGRI(FM) accordingly,

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<sup>1</sup>KIXK(FM) commenced operations on November 14, 2000, and an application for license was granted on December 5, 2000. KIXK(FM) remained on the air only for a short period, however, and has requested special temporary authority (an STA) to remain silent.

and allot Channel 256A at Pineland, Texas. Reynolds hereby incorporates by reference its Petition For Rulemaking and restates its present intention to apply for Channel 257C2 at White Oak, Texas, Channel 260A at Zwolle, Louisiana, and Channel 256A at Pineland, Texas if allotted, and, if authorized, to build the stations promptly.

As requested in the NPRM, Reynolds hereby submits the attached information regarding the number of people within the gain and loss areas at Linden and White Oak, Texas and the gain and loss areas at Mount Enterprise, Texas and Zwolle, Louisiana.

### **Counterproposal**

Alternatively, in the event that the Commission is unable to grant Reynolds Petition For Rulemaking, Reynolds submits the following counterproposal:

(1) Station KIXK(FM), Linden, Texas, proposes to upgrade Channel 257C2 to Channel 257C1 at a new transmitter site;

(2) In order to accommodate the changes at Linden, Texas, Station KGRI(FM), Mount Enterprise, Texas, proposes to change its community of license from Mount Enterprise, Texas to Zwolle, Louisiana as a first local service and change its transmitter site location; and

(3) The changes Reynolds requests in its counterproposal allow Reynolds to propose the allotment of Channel 256A at Pineland, Texas as a first local service.

Reynolds hereby states that, should the Commission upgrade Channel 257C2 to Channel 257C1 at Linden, Texas as requested, Reynolds will apply for the modified facility on Channel 257C1 to implement the changes and will construct the modified facility in an expeditious manner and that, should the Commission reallocate Channel 260A

to Zwolle, Louisiana as requested, Reynolds will apply for the modified facility on Channel 260A at Zwolle, Louisiana to implement the changes and will construct the modified facility in an expeditious manner. Reynolds also hereby states that, should the Commission allot Channel 256A to Pineland, Texas, Reynolds will apply for a facility on Channel 256A at Pineland, Texas and, should the Commission grant Reynolds' application for the facility, construct the facility in an expeditious manner.

In order to accommodate these proposed changes, it will be necessary to make the following additional changes to the FM Table of Allotments. Reynolds has entered into a written agreement with and provided with its Petition For Rulemaking a consent statement from the licensee of KUEZ(FM), Lufkin, Texas in connection with KUEZ's channel change. Reynolds has agreed to reimburse the licensee of KUEZ for the reasonable costs of its channel change and hereby states that it will so reimburse the licensee of KUEZ for its channel change. The additional changes involve the following allotments:

- (1) Station KUEZ(FM), Lufkin, Texas has agreed to substitute Channel 261C2 for Channel 257C2, and a consent statement is attached;
- (2) Allotment at Corrigan, Texas to substitute Channel 257A for Channel 261A and change the reference coordinates; and
- (3) Allotment at Sulphur Bluff, Texas to substitute Channel 282A for Channel 259A and change the reference coordinates.

The following is a listing of all of the requested changes to the current FM Table of Allotments:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Zwolle, LA	-----	260A
Corrigan, TX	261A	257A
Linden, TX	257C2	257C1
Lufkin, TX	257C2	261C2
Mount Enterprise, TX	260A	-----
Pineland, TX	-----	256A
Sulphur Bluff, TX	259A	282A

### **COMPLIANCE WITH RULES**

#### **KIXK(FM) - Linden, Texas**

##### **Technical Compliance**

The requested upgrade of Channel 257C2 to Channel 257C1 at Linden, Texas at a different transmitter site (N33-01-20, W94-48-14) is shortspaced to licensed Station KUEZ(FM) on Channel 257C2 at Lufkin, Texas, and vacant allotment Channel 259A at Sulphur Bluff, Texas. The requested changes at Linden can be made in compliance with the Commission's spacing rules and city grade coverage rules if the additional changes below are made.

Channel 261C2 can be substituted for Channel 257C2 at Lufkin, using KUEZ's licensed site, resulting in KUEZ being fully spaced to the Linden upgrade, if the changes requested herein for the allotments at Corrigan and Mount Enterprise, Texas are made. The licensee of KUEZ has consented to the channel change. Its consent was attached to the Petition For Rulemaking and is incorporated herein by reference. Reynolds has entered into a reimbursement agreement with KUEZ and hereby states

that it will reimburse KUEZ for its expenses in changing channel. The KUEZ change can be made if (i) Channel 257A is substituted for Channel 261A at Corrigan, Texas at a different reference site (N30-57-30, W94-48-03) and (ii) the permit for KGRI on Channel 260A at Mount Enterprise, Texas is reallocated to Zwolle, Louisiana at a different site (N31-37-53, W93-38-39). Corrigan is a vacant allotment, for which no applications are pending. Reynolds, the permittee of KGRI, Mount Enterprise, Texas is proposing the change at Mount Enterprise as the proponent herein.

In addition, Channel 282A can be substituted for Channel 259A at Sulphur Bluff, Texas at a different reference site (N33-26-50, W95-23-43). Sulphur Bluff is a vacant allotment, for which no applications are pending.

The proposed upgrade of Station KIXK will result in a population gain of 220,019 persons within the 60 dBu contour. The proposed 60 dBu completely encompasses the current 60 dBu contour, with the result that there is no loss area.

### **KUEZ(FM) - Lufkin, Texas**

#### **Technical Compliance**

KUEZ(FM) is currently licensed and operating on Channel 257C2 at Lufkin, Texas. It would be shortspaced to the Linden upgrade on Channel 257C2. Channel 261C2 can be substituted for Channel 257C2 at Lufkin at KUEZ's licensed site, which would result in KUEZ being fully spaced to the Linden upgrade. The Channel 261C2 allotment at Lufkin would be short-spaced with KGRI(FM) on Channel 260A at Mount Enterprise, Texas and the vacant allotment on Channel 261A at Corrigan, Texas. If the

changes requested below at Mount Enterprise and Corrigan are made, Channel 261C2 at Lufkin will be fully spaced.

### **KGRI(FM) - Mount Enterprise, Texas to Zwolle, Louisiana**

#### **Technical Compliance**

Station KGRI has a permit to operate on Channel 260A at Mount Enterprise. The station has not yet been constructed. In order to substitute Channel 261C2 for Channel 257C2 at Lufkin, Texas, KGRI must be reallocated to Zwolle, Louisiana at a different site (N31-37-53, W93-38-39). As shown in the Engineering Statement, Channel 260A can be reallocated from Mount Enterprise to Zwolle at the specified site in compliance with the Commission's spacing rules and city grade coverage rules. At the specified site in Zwolle, KGRI will have a net loss in population of 8,751 persons. There will be no loss of existing service, however, since KGRI has not yet been constructed. Additionally, the KGRI proposal is requested in order to accommodate the KIXK upgrade at Linden. Accordingly, the KGRI proposal must be considered within the context of the entire proposal herein, which provides numerous public interest benefits. Moreover, the loss area will continue to receive five or more aural services. More importantly, the Engineering Statement demonstrates that a small portion of the KGRI gain area currently receives only three aural services and this proposal would provide a fourth service there. Gain and loss area information is attached.

The proposed reallocation complies with the standards set forth in *Community of License*. The allotment of Channel 260A at Mount Enterprise is mutually exclusive with the allotment of Channel 260A at Zwolle. Under the Commission's allotment priorities, a first local service to the new, larger community of Zwolle (pop. 1,779) is preferred over

first service to the existing, smaller community of Mount Enterprise (pop. 501) as a fourth priority. *E.g. Moncks Corner, Kiawah, and Sampit, South Carolina*, DA 00-1112, released May 19, 2000; *Northwye, et al., Missouri*, 7 FCC Rcd 1449 (1992). In addition, although KGRI is the only local service assigned to Mount Enterprise, it has not yet been constructed. Accordingly, the reallocation to Zwolle will not cause the loss of an existing service at Mount Enterprise. *E.g. Jewett and Windham, New York*, 14 FCC Rcd 21151 (1999); *Genoa, Mt. Morris, and Oregon, Illinois*, 14 FCC Rcd 10727 (1999); *Chatom and Grove Hill, Alabama*, 12 FCC Rcd 7664 (1997).

### **Change In Community Of License**

Reynolds' showing in its Petition For Rulemaking demonstrating that Zwolle is an established community well deserving of a first local broadcast service is hereby incorporated by reference.

### **Corrigan, Texas**

#### **Technical Compliance**

Channel 261A is currently allotted at Corrigan, Texas. It would be short-spaced with the proposed substitution of Channel 261C2 at Lufkin, Texas. Channel 257A can be substituted for Channel 261A at Corrigan with a change in the reference coordinates (N30-57-30, W94-48-03). From this site, Channel 257A at Corrigan would be fully spaced to the proposed Lufkin allotment and all other allotments. From the proposed reference coordinates, the 70dBu contour will completely cover Corrigan.



## **Sulphur Bluff, Texas**

### **Technical Compliance**

Channel 259A is currently allotted at Sulphur Bluff, Texas. It would be short-spaced with the proposed upgrade at Linden. Channel 282A can be substituted for Channel 259A at Sulphur Bluff with a change in the reference coordinates (N33-26-50, W95-23-43). From this site, Channel 282A at Sulphur Bluff would be fully spaced to the proposed Linden upgrade and all other allotments. From the proposed reference coordinates, the 70dBu contour will completely cover Sulphur Bluff.

## **Pineland, Texas**

### **Technical Compliance**

As shown in the Engineering Statement, if the changes requested herein are made, Channel 256A can be allotted at Pineland at the specified site (N31-08-48, W93-56-53) in compliance with the Commission's spacing rules and city grade coverage rules. A Pineland station at the specified site will serve 20,560 persons within the 60 dBu contour.

### **Community of License**

Reynolds' showing in its Petition For Rulemaking demonstrating that Pineland is an established community well deserving of a first local broadcast service is hereby incorporated by reference.

### **Conclusion**

Reynold's initial proposal in its Petition For Rulemaking will allow KIXK to greatly increase the number of persons receiving its service, without any existing service being eliminated or any existing stations being adversely affected. The proposal will provide

new first local services to the communities of White Oak, Texas, Zwolle, Louisiana, and Pineland, Texas. It will provide overall net gains in population to 247,968 people. The overwhelming public interest benefits of the proposal warrant Commission approval.

Alternatively, if the Commission is unable to grant Reynolds' initial proposal, Reynolds' counterproposal will allow KIXK to greatly increase the number of persons receiving its service, without any existing service being eliminated or any existing stations being adversely affected. The proposal will provide new first local services to the communities of Zwolle, Louisiana and Pineland, Texas. It will provide overall net gains in population to 231, 828 people. The overwhelming public interest benefits of the proposal warrant Commission approval.

Respectfully submitted,

Reynolds Radio, Inc.

By: 

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Fletcher, Heald & Hildreth, P.L.C.  
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(703) 812-0438

Its Attorney

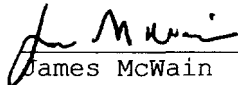
January 2, 2001

DECLARATION

I, JAMES MCWAIN, declare that;

1. I am the Technical Director of Reynolds Radio, Inc. and
2. That all statements and representations of fact contained in this technical statement and exhibits are true and correct to my own knowledge.

Date: 12-28-00

  
James McWain

Reynolds Radio, Inc.

Docket 00-228

Exhibit E-I Supplement

Theoretical Loss and Gain Area Population Study

257C2 Linden----257C2 White Oak

Loss Area Size	6633.27 sq. km
Loss Area Population	100,574
Gain Area Size	6714.96 sq. km.
Gain Area Population	336,733

260A Mount Enterprise----260A Zwolle

Loss Area Size	2516.07 sq. km
Loss Area Population	32,267
Gain Area Size	2516.07 sq. km
Gain Area Population	23,516

## **TECHNICAL STATEMENT**

This technical statement has been prepared in support of REYNOLDS RADIO, Inc.'s ("RRI") petition to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules).

REYNOLDS RADIO, licensee of Station KIXK(FM) on 257C2 at Linden, Texas, proposes to upgrade 257C2 at Linden, Texas to 257C1 at a new reference site, and modify the license of KIXK to specify operation on 257C1. REYNOLDS RADIO is additionally the permittee of unbuilt Station KGRI(FM) on 260A at Mount Enterprise. REYNOLDS RADIO proposes to reallocate 260A from Mount Enterprise, Texas to Zwolle, Louisiana in order to accommodate the proposals set forth herein.

In order to make these changes, REYNOLDS RADIO is proposing several related changes in the FM Table of Allotments which will provide substantial public interest benefits. The proposal includes establishing first local service to two communities, one in Texas and one in Louisiana.

To summarize, this petition includes:

1. **Linden, Texas.** Upgrade 257C2 to **257C1** at new reference site and modify the license of KIXK (FM) accordingly
2. **Lufkin, TX.** Substitute **261C2** for 257C2 at its licensed site and modify the license of Radio Station KUEZ (FM) accordingly.
3. **Mount Enterprise, Texas/Zwolle, LA.** Reallot **260A** at Mount Enterprise, Texas to Zwolle, Louisiana as a first local service at a new site and modify the construction permit of Radio station KGRI (FM) accordingly.
4. **Corrigan, TX.** Substitute **257A** for 261A at Corrigan at a new reference site.
5. **Pineland, TX.** Allot **256A** as a first local service.
6. **Sulphur Bluff, TX.** Substitute **282A** for 259A at a new reference site.

## Discussion

**Linden, Texas.** KIXK (FM) is currently licensed to Linden, TX on FM channel 257C2 which can be upgraded to **257C1** at the reference site: **N33-01-20 W94-48-14**. From this site, the proposed 70dBu contour will completely cover the city of Linden. The 1990 population within the proposed 60dBu contour is 345,548 compared with the currently authorized 60dBu contour population of 125,529. The proposed 60 dBu contour completely encompass the present 60 dBu contour, therefore there is no loss area. This proposal is short-spaced with KUEZ(FM) on 257C2 at Lufkin, Texas and 259A at Sulphur Bluff, Texas. It's proposed to change the 257C2 allotment at Lufkin to 261C2 and the 259A allotment at Sulphur Bluff to 282A. This proposal would appear to be short-spaced with KNBB on 257C3 at Ruston, Louisiana. However, KNBB at Ruston is operating as a 73.215 station and, as required, this proposal protects KNBB's existing 73.215 contour.

**Sulphur Bluff, Texas.** FM Channel 259A is allotted at the reference site: N33-09-07 W95-36-12. This site is short-spaced with the proposed 257C1 upgrade at Linden. It is proposed to substitute FM Channel **282A** at the reference site: **N33-26-50 W95-23-43**. From this site, the 70 dBu contour will completely cover the city of Sulphur Bluff. This substitution can be made without any changes to other assignments or allocations.

**Ruston, Louisiana.** KNBB(FM) is licensed on FM Channel 257C3. This would appear to be short-spaced with the 257C1 Linden allocation. However, KNBB operates as a 73.215 station. The Linden 257C1 upgrade would protect KNBB's existing 73.215 contour, as required.

**Lufkin, Texas.** KUEZ (FM) is currently licensed and operating on 257C2 at Lufkin. It would be short-spaced with the proposed upgrade to 257C1 allotment at Linden. KUEZ (FM) can change to **261C2** at its licensed site and be fully spaced with 257C1 at Linden. The co-ordinates are **N31-24-28 W94-45-53**. The 261C2 allotment at Lufkin would be short-spaced with KGRI (FM) on 260A at Mt. Enterprise, Texas, and the 261A allotment at Corrigan, Texas.

**Mount Enterprise, Texas/Zwolle, Louisiana.** The 1990 Mount Enterprise population is 501, while the Zwolle 1990 population is 1,779. A construction permit for KGRI (FM) is currently authorized at Mount Enterprise, Texas on FM channel 260A. KGRI (FM) has not yet been constructed or placed on the air. It would be short-spaced with the proposed substitution of 261C2 at Lufkin, Texas. FM channel **260A** can be reallocated to Zwolle, Louisiana at reference site: **N31-37-53 W93-38-39**, which would be fully spaced. From this site, the proposed 70dBu contour will completely cover the city of Zwolle. The 1990 population within the proposed 60dBu contour is 23,516, compared with the currently authorized 60dBu contour population of 32,267. A small portion of the gain area currently receives only three services and this proposal would provide a fourth service there. There would be a loss area. There are five or more stations which will continue to provide service in this loss area. See attached gain and loss information.

**Corrigan, Texas.** FM channel 261A is currently allotted at Corrigan. It would be short-spaced with the proposed substitution of 261C2 at Lufkin, Texas. FM channel 257A can be substituted for 261A at Corrigan with a change in the reference co-ordinates. The **257A** reference



co-ordinates are **N30-57-30 W94-48-03**. This reference site is one of the higher points in the area to locate. From this site, the 70 dBu contour will completely cover Corrigan.

**Pineland, Texas.** With the proposed substitution of 261C2 for 257C2 at Lufkin, Texas, FM channel **256A** can be allotted to Pineland at the reference site: **N31-08-48 W93-56-53**, which would be fully spaced.

Pineland is within the boundary of the Sabine National Forest; therefore the reference site must be site-restricted to a location about 11km south of Pineland. From this site, the proposed 70 dBu contour will completely cover the city of Pineland.

The 1990 population of Pineland was 882. The population within the proposed 60 dBu contour is 20,560.

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## Exhibit E-I Page 1 Add 257C1 Linden, Texas Allocation Study

Search Channel: 257  
Latitude: 330120

Class: C1  
Longitude: 944814

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short
NEW	Zwolle	260	A	144.70	188.97	75.00	OK
256A	Pineland	256	A	158.77	223.11	133.00	OK
Ref	Corrigan	257	A	180.56	226.37	200.00	OK
NEW	Cotton Valley	203	C2	110.81	107.52	27.00	OK
NEW	Jonesboro	203	A	113.49	213.96	22.00	OK
KBMQ	Monroe	204	C3	103.13	261.12	24.00	OK
KNBB	Ruston	257	C3	106.75	208.16	211.00	Short
Proposed in instant counterproposal to use 73.215 contour protection							
KMJJFM	Shreveport	259	C2	115.48	106.91	79.00	OK
KUST	Huntsville	259	C3	193.89	264.83	76.00	OK
KTPB	Kilgore	204	C1	196.56	79.25	34.00	OK
KIXK	Linden	257	C2	53.31	18.66	224.00	Short
Proposed in instant counterproposal to upgrade to 257C1							
KUEZ	Lufkin	257	C2	178.82	179.06	224.00	Short
Proposed in Docket 00-228 to change to 261C2							
KEOM	Mesquite	203	C1	260.45	173.69	34.00	OK
KMOOFM	Mineola	260	A	246.84	76.45	75.00	Close
KGRI	Mt Enterprise	260	A	176.41	114.63	75.00	OK
Reno	Reno	255	A	314.03	103.36	75.00	OK
FA USE	Sulphur Bluff	259	A	306.62	67.29	75.00	Short
Proposed in instant counterproposal to change to 282A							
Van Al	Van Alstyne	260	A	287.21	161.18	75.00	OK
KTUX	Carthage	255	C1	133.69	101.72	82.00	OK
NEW	Crockett	203	A	198.58	198.32	22.00	OK
KLUVFM	Dallas	254	C	256.65	208.32	105.00	OK
KHCK	Denton	256	C	278.99	260.62	209.00	OK
KNES	Fairfield	256	C3	221.04	194.72	144.00	OK
KNES	Fairfield	256	C3	217.67	187.76	144.00	OK
KTCUFM	Fort Worth	204	A	261.81	242.33	22.00	OK
KTCUFM	Fort Worth	204	C3	261.81	242.33	24.00	OK
KPLX	Fort Worth	258	C	256.49	209.19	209.00	Close
NEW	Ada	204	C2	319.69	255.03	27.00	OK
NEW	Ardmore	204	C3	300.99	254.33	24.00	OK
Ada	Ada	257	A	316.24	259.00	200.00	OK
KADAFM	Ada	257	A	317.03	256.05	200.00	OK
KTSH	Tishomingo	259	C3	312.34	220.21	76.00	OK
KTSH	Tishomingo	259	C3	312.34	220.21	76.00	OK
KTSH	Tishomingo	259	C3	307.83	236.39	76.00	OK
KBPU	De Queen	204	A	19.90	120.84	22.00	OK
KLBO	El Dorado	254	C3	84.03	198.58	76.00	OK
KMAG	Fort Smith	256	C	2.88	227.86	209.00	OK
KTCFSM	Fort Smith	260	C	2.87	227.67	105.00	OK
KHMB	Hamburg	258	A	83.82	274.45	133.00	OK
KGPO	Monticello	260	C3	74.23	288.96	76.00	OK
KMTB	Murfreesboro	258	C3	37.44	143.84	144.00	Short
KZYP	Pine Bluff	257	A	63.12	287.07	200.00	OK
Waldo	Waldo	256	A	73.18	143.45	133.00	OK
NEW	Waldo	256	A	77.53	154.65	133.00	OK

## Exhibit E-I Page 1a 257C1 Linden Area to Locate

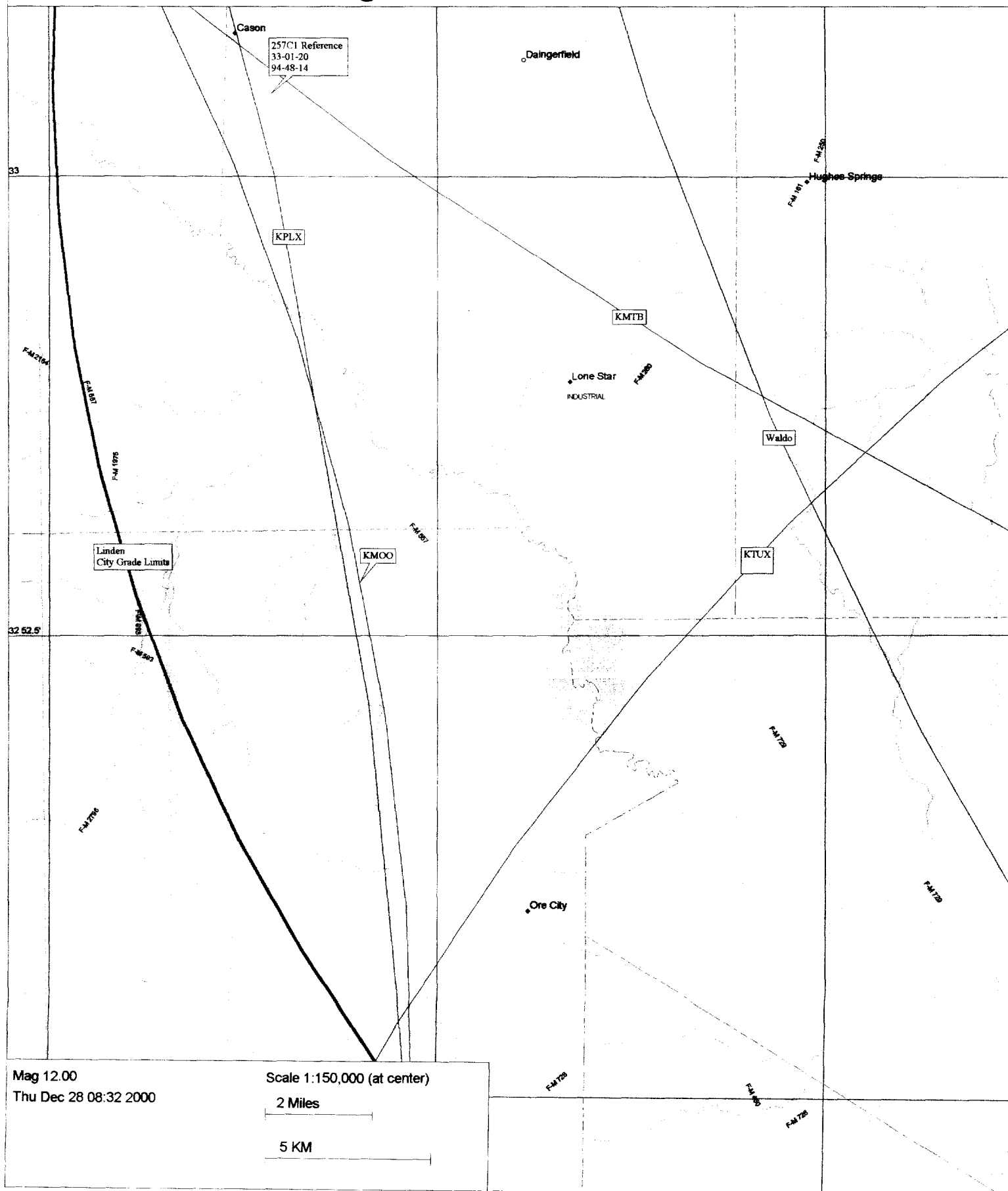
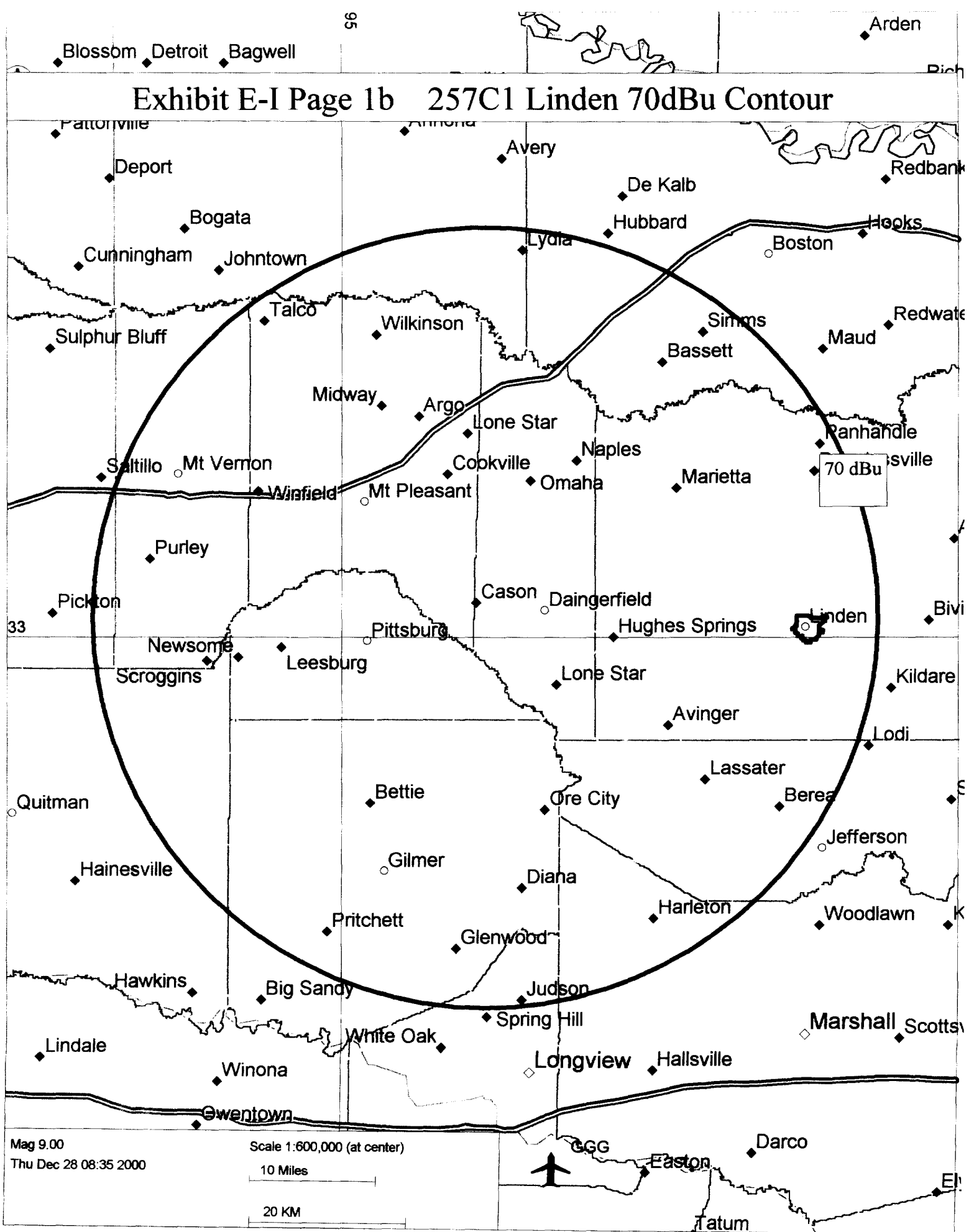


Exhibit E-I Page 1b 257C1 Linden 70dBu Contour



## Exhibit E-I Page 2 Add 282A Sulphur Bluff, Texas

Search Channel: 282  
Latitude: 332650

Class: A  
Longitude: 952343

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short
KBEF	Gibbsland	283	A	116.22	229.47	72.00	OK
KDKSFM	Haughton	279	A	120.34	196.32	31.00	OK
KORI	Mansfield	284	C3	139.55	216.20	42.00	OK
KITT	Shreveport	229	C	121.92	161.44	29.00	OK
KWNS	Winnsboro	284	A	166.69	42.83	31.00	OK
KJTX	Jefferson	283	A	128.89	110.26	72.00	OK
KICM	Krum	229	C2	272.85	164.58	15.00	OK
Lovela	Lovelady	282	C3	181.22	253.22	142.00	OK
KZEYFM	Marshall	280	A	135.11	138.27	31.00	OK
Meridi	Meridian	285	A	232.99	269.34	31.00	OK
KYCXFM	Mexia	285	A	208.75	220.13	31.00	OK
KTCY	Pilot Point	285	C1	274.93	145.88	75.00	OK
KMRR	Sanger	281	C3	269.18	174.33	89.00	OK
KKUS	Tyler	281	C2	184.38	105.97	106.00	Short
KGASFM	Carthage	282	A	147.93	170.74	115.00	OK
KWOW	Clifton	281	C3	226.52	266.37	89.00	OK
KBHT	Crockett	228	C2	188.94	237.20	15.00	OK
KKDAFM	Dallas	283	C	237.11	175.17	165.00	OK
KIKT	Greenville	228	C3	244.54	68.07	12.00	OK
KIKT	Greenville	228	A	244.54	68.07	10.00	OK
NEW	Hemphill	280	A	148.02	275.37	31.00	OK
NEW	Hemphill	280	A	146.84	268.25	31.00	OK
Hemphi	Hemphill	280	A	148.00	273.15	31.00	OK
NEW	Hemphill	280	A	147.54	273.31	31.00	OK
KVILFM	High Park-Da	279	C	237.06	175.11	95.00	OK
NEW	Wilburton	279	C1	350.58	173.13	75.00	OK
Wynnew	Wynnewood	283	A	309.09	210.72	72.00	OK
Antler	Antlers	284	A	347.62	89.08	31.00	OK
KSLE	Wewoka	284	A	329.95	210.77	31.00	OK
KREK	Bristow	285	A	339.38	277.24	31.00	OK
KHSPFM	Ashdown	280	A	82.04	123.64	31.00	OK
KEZU	Booneville	284	C2	31.18	225.13	55.00	OK
KMGC	Camden	283	A	88.50	240.33	72.00	OK
KISR	Fort Smith	229	C	21.81	247.99	29.00	OK
KLMZFM	Fouke	282	A	98.33	142.07	115.00	OK
KWXE	Glenwood	283	A	60.92	197.00	72.00	OK
KBII	Hatfield	281	C2	39.67	167.35	106.00	OK
KHPA	Hope	285	A	80.31	179.78	31.00	OK
Stamps	Stamps	282	A	92.25	164.58	115.00	OK
KLMZ	Stamps	282	A	90.05	165.69	115.00	OK
KTOY	Texarkana	284	A	89.45	112.71	31.00	OK

# Exhibit E-I Page 2a Add 282A Sulphur Bluff Area to Locate

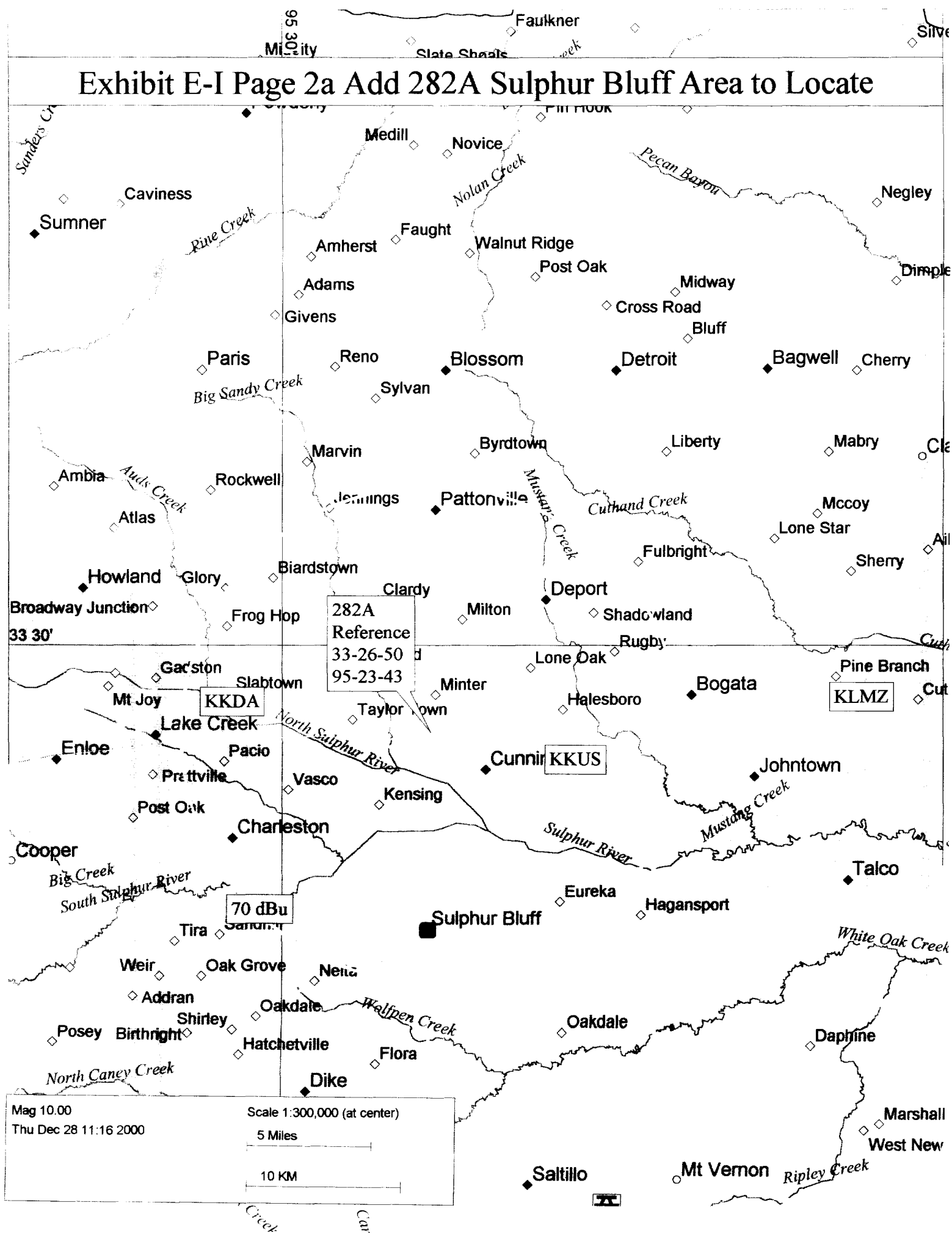


Exhibit E-I Page 3 Add 261C2 Lufkin, TX Allocation Study

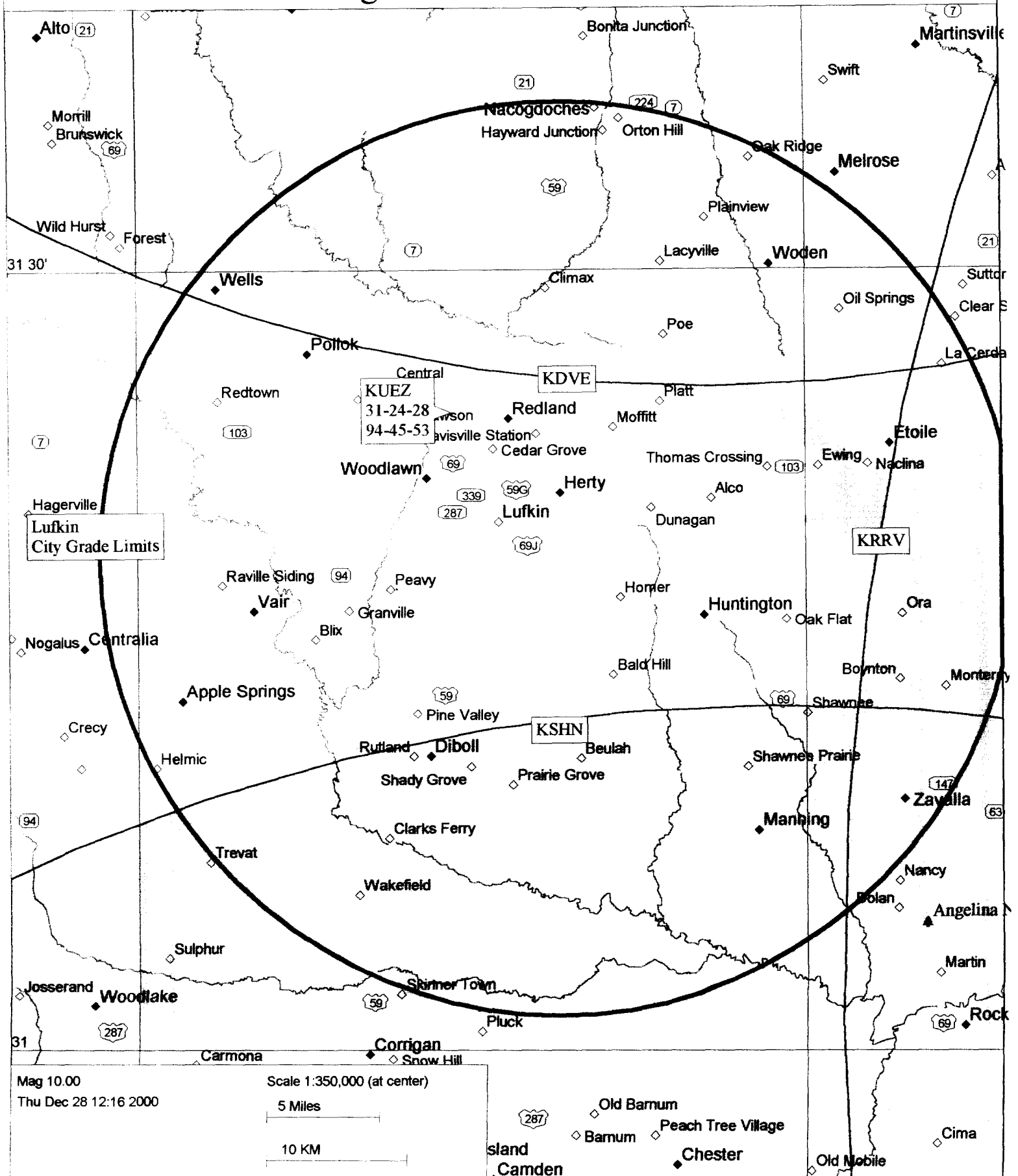
Search Channel: 261  
Latitude: 312428

Class: C2  
Longitude: 944553

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short
NEW	Zwolle	260	A	76.89	109.28	106.00	Close
Proposed in Docket 00-228							
KRRVFM	Alexandria	262	C	100.91	219.55	188.00	OK
NEW	Bunkie	208	A	101.58	251.21	15.00	OK
NEW	Bunkie	208	A	101.03	256.76	15.00	OK
Lake C	Lake Charles	258	C	123.67	202.47	105.00	OK
KHLA	Lake Charles	258	C1	123.56	202.15	79.00	OK
KHLA	Lake Charles	258	C	123.67	202.47	105.00	OK
KAVK	Many	207	C3	83.70	128.33	17.00	OK
KYFL	Monroe	208	C2	62.89	278.44	20.00	OK
KZBL	Natchitoches	264	C3	75.08	170.94	56.00	OK
KMJJFM	Shreveport	259	C2	35.15	162.70	58.00	OK
KRTXFM	Winnie	264	C	171.39	152.09	105.00	OK
Vacant	Bogata	263	A	349.60	224.29	55.00	OK
KUST	Huntsville	259	C3	220.99	103.43	56.00	OK
KSHN	Liberty	260	C2	171.39	152.09	130.00	OK
KMVLFM	Madisonville	263	C3	253.79	117.82	56.00	OK
KMOOFM	Mineola	260	A	333.39	166.60	106.00	OK
KGRI	Mt Enterprise	260	A	3.13	64.71	106.00	Short
Proposed in Docket 00-228 to change to 260A Zwolle, LA							
KPXI	Overton	264	C3	341.42	87.05	56.00	OK
KBCV	Paris	207	C1	346.26	276.14	27.00	OK
KBCV	Paris	207	C3	346.26	276.14	17.00	OK
FA USE	Sulphur Bluff	259	A	345.13	226.75	55.00	OK
Proposed in instant counterproposal to change to 282A							
KDVE	Tatum	262	A	9.65	109.00	106.00	Close
KVNE	Tyler	208	C1	341.02	132.66	27.00	OK
Van Al	Van Alstyne	260	A	324.95	276.94	106.00	OK
WACOFM	Waco	260	C	268.16	242.29	188.00	OK
KPYN	Atlanta	261	C2	17.28	214.52	190.00	OK
KBMA	Bryan	258	A	240.98	173.03	55.00	OK
KDETFM	Center	263	A	53.76	59.70	55.00	Close
Cor	Corrigan	261	A	187.77	46.00	166.00	Short
Proposed in instant counterproposal to change to 257A							
KNON	Dallas	207	C1	302.14	246.39	27.00	OK
KRBV	Dallas	262	C	302.14	245.31	188.00	OK
KPLX	Fort Worth	258	C	301.92	246.16	105.00	OK
KILTFM	Houston	262	C	199.41	215.29	188.00	OK
KSBJ	Humble	207	C1	193.21	136.71	27.00	OK
KZHE	Stamps	263	C2	31.45	268.85	58.00	OK
NEW	Texarkana	207	C3	20.58	234.13	17.00	OK
NEW	Texarkana	207	C3	16.93	243.97	17.00	OK



## Exhibit E-I Page 4 KUEZ 261C2 Area to Locate



## Full Study

Exhibit E-I Page 5 Add 257A Corrigan, Tx allocation Study

Search Channel: 257

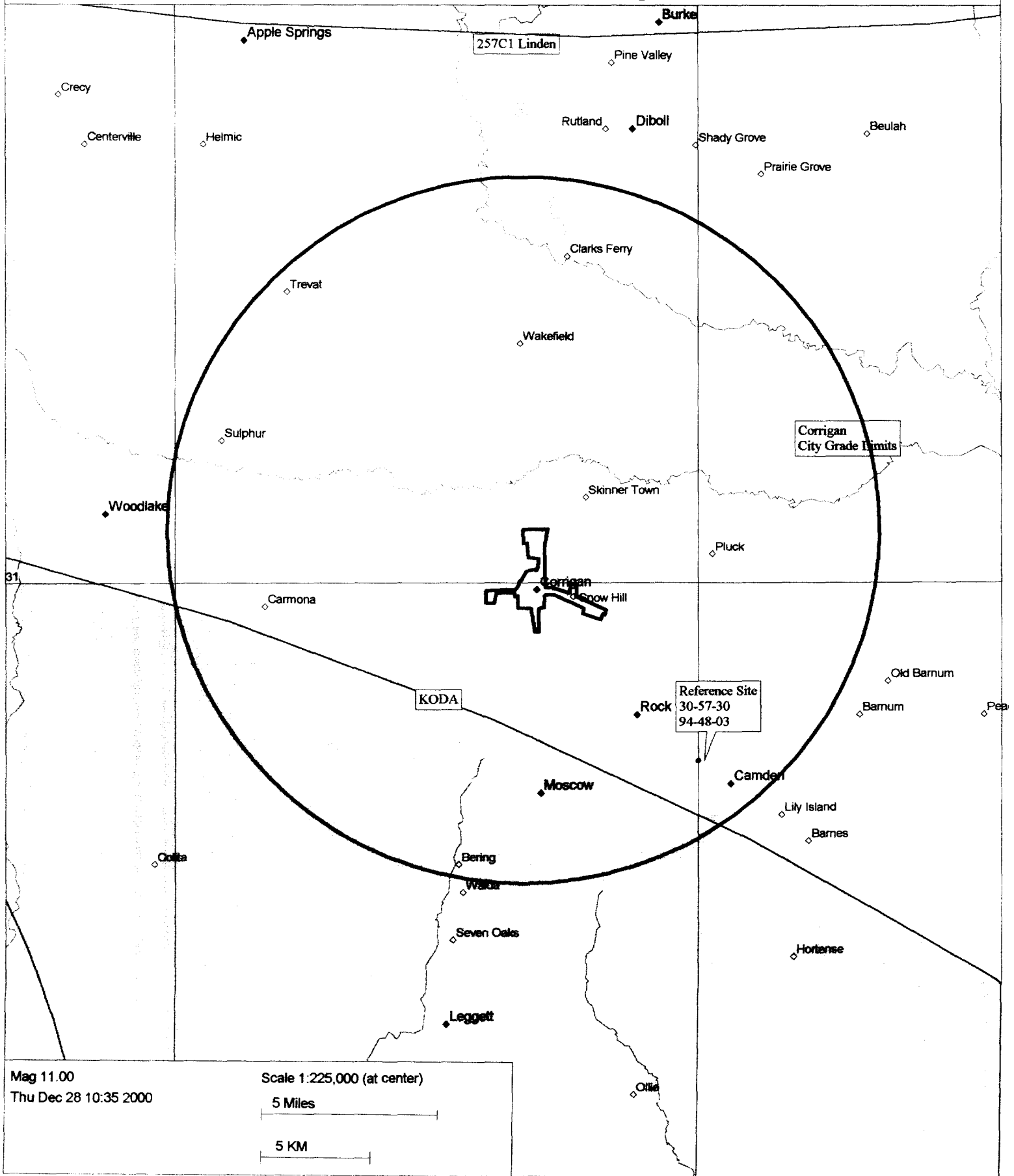
Class: A

Latitude: 305730

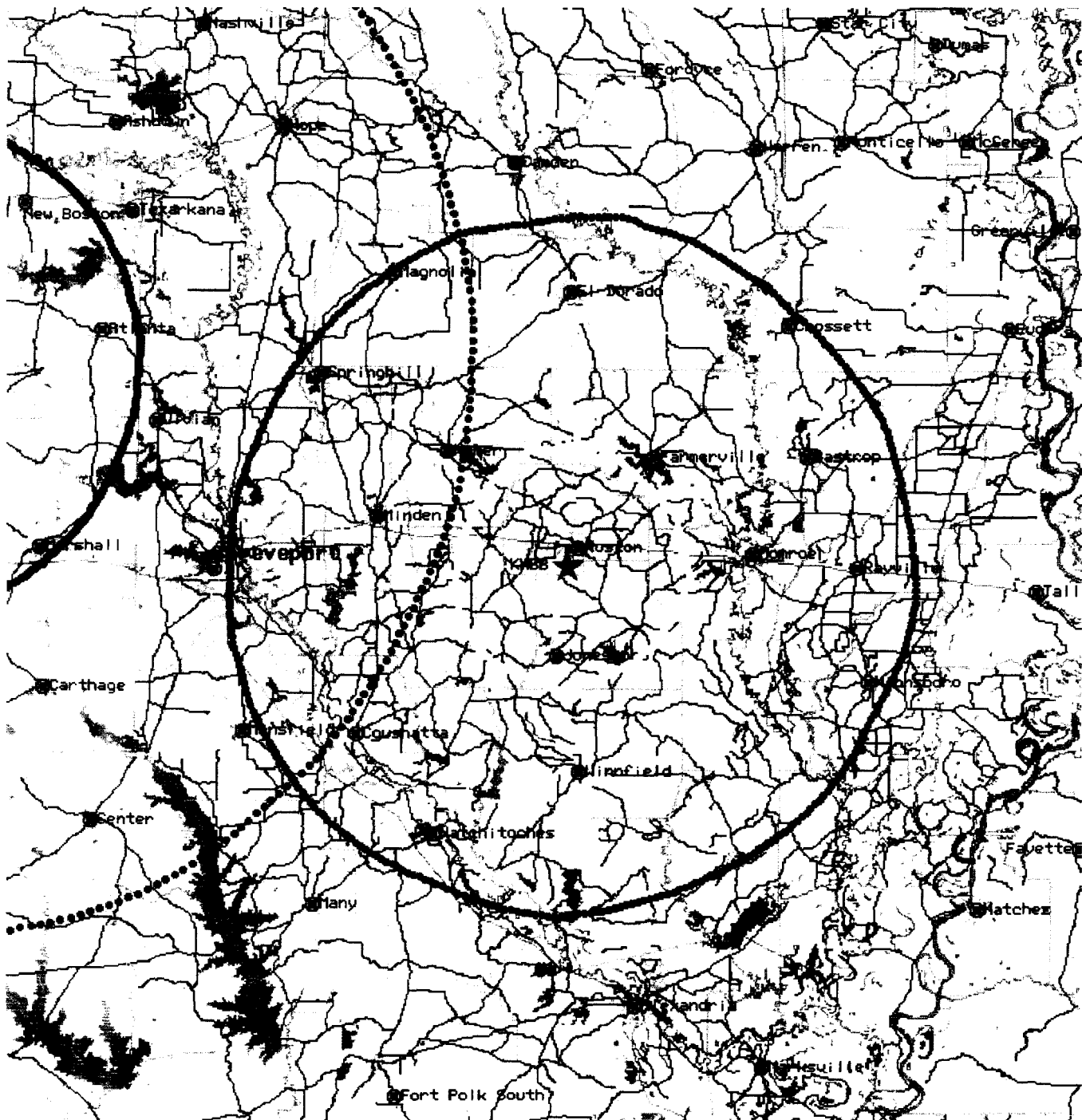
Longitude: 944803

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short
NEW	Zwolle	260	A	55.88	133.03	31.00	OK
Proposed in Docket 00-228							
256A	Pineland	256	A	75.61	84.04	72.00	OK
Proposed in Docket 00-228							
NEW	Cotton Valley	203	C2	28.00	215.92	15.00	OK
NEW	Jonesboro	203	A	54.08	244.69	10.00	OK
KRVS	Lafayette	204	C1	107.07	264.86	22.00	OK
Lake C	Lake Charles	258	C	109.91	183.31	165.00	OK
KHLA	Lake Charles	258	C1	109.77	183.09	133.00	OK
KHLA	Lake Charles	258	C	109.91	183.31	165.00	OK
KKST	Oakdale	254	C1	87.84	219.70	75.00	OK
KNBB	Ruston	257	C3	50.01	262.76	142.00	OK
KMJJFM	Shreveport	259	C2	28.02	207.14	55.00	OK
Add	Bay City	259	C2	208.63	273.01	55.00	OK
KUST	Huntsville	259	C3	246.37	70.46	42.00	OK
KTPB	Kilgore	204	C1	351.40	154.63	22.00	OK
KSHN	Liberty	260	C2	165.34	103.92	55.00	OK
KIXK	Linden	257	C2	3.54	240.46	166.00	OK
Proposed in instant counterproposal to upgrade to 257C1							
KUEZ	Lufkin	257	C2	3.95	49.95	166.00	Short
Proposed in Docket 00-228 to change to 261C2							
KEOM	Mesquite	203	C1	319.06	264.82	22.00	OK
KMOOFM	Mineola	260	A	340.25	211.21	31.00	OK
KGRI	Mt Enterprise	260	A	3.48	114.66	31.00	OK
Proposed in Docket 00-228 to change to 260A Zwolle, LA							
KKOS	Palacios	259	C2	206.79	276.53	55.00	OK
FA USE	Sulphur Bluff	259	A	348.46	274.54	31.00	OK
Proposed in instant counterproposal to change to 282A							
NEW	Temple	203	A	270.64	270.48	10.00	OK
NEW	Thorndale	257	A	257.25	234.54	115.00	OK
NEW	Thorndale	257	A	257.09	231.00	115.00	OK
Thornd	Thorndale	257	A	257.25	234.54	115.00	OK
NEW	Thorndale	257	A	256.30	233.98	115.00	OK
NEW	Thorndale	257	A	256.69	232.80	115.00	OK
NEW	Thorndale	257	A	257.21	236.19	115.00	OK
NEW	Thorndale	257	A	257.31	236.72	115.00	OK
NEW	Vidor	203	C3	139.87	126.19	12.00	OK
NEW	Vidor	203	C3	133.17	111.03	12.00	OK
WACOFM	Waco	260	C	279.96	242.96	95.00	OK
KYCM	Bastrop	203	A	249.87	239.16	10.00	OK
KYCM	Bastrop	203	A	249.87	239.16	10.00	OK
NEW	Beaumont	203	C3	133.17	111.03	12.00	OK
NEW	Beaumont	203	C3	135.35	121.33	12.00	OK
KBMA	Bryan	258	A	257.03	152.08	72.00	OK
KTUX	Carthage	255	C1	25.04	175.04	75.00	OK
NEW	Crockett	203	A	302.49	76.09	10.00	OK
KLUVFM	Dallas	254	C	311.36	273.53	95.00	OK
KNES	Fairfield	256	C3	302.32	153.33	89.00	OK
KNES	Fairfield	256	C3	304.60	141.30	89.00	OK
KPLX	Fort Worth	258	C	311.14	273.57	165.00	OK
KTXM	Hallettsville	260	A	231.09	264.00	31.00	OK
KUHF	Houston	204	C	203.48	167.30	29.00	OK
KODA	Houston	256	C	204.01	167.73	165.00	Close

# Exhibit E-I Page 5a ADD257A Corrigan Area to Locate



Contacting the Census Bureau's Tiger Map Server to generate the map ...  
This process may take a few minutes, particularly during business hours.



# LEGEND

RED, BLACK (69,50)

BLUE, GREEN (40,10)

State  
County  
Lake/Pond/Ocean  
Expressway  
Highway  
Connector  
Stream

Military Area  
National Park  
City  
County

EXHIBIT E-I

PAGE 6

Scale 1:1407301 0 10 20 30 40 50 mi  
0 10 20 30 40 50 km  
Average--true scale depends on monitor resolution

## Exhibit E-I Page 11 260A Zwolle, LA Allocation Study

Search Channel: 260  
Latitude: 313753

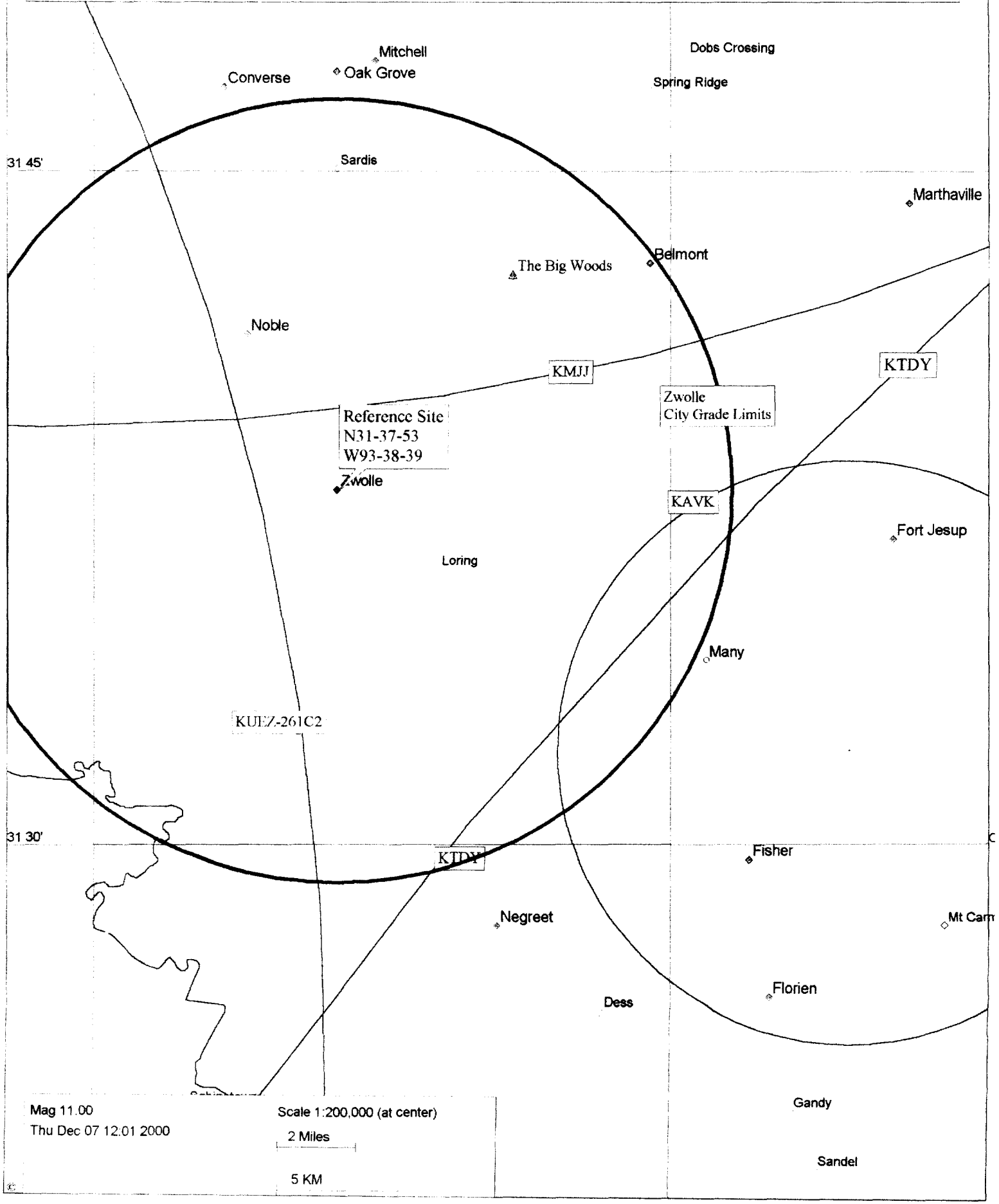
Class: A  
Longitude: 933839

12-28-2000

14:08:15

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short Close
KUEZ	Lufkin	261	C2	256.89	109.28	106.00	Close
Proposed in Docket 00-228							
Ref	Corrigan	257	A	237.36	133.74	31.00	OK
Proposed in instant counterproposal							
KRRVFM	Alexandria	262	C	121.40	127.33	95.00	OK
KRVV	Bastrop	261	C2	54.67	199.57	106.00	OK
WRKF	Baton Rouge	207	C1	120.92	271.59	22.00	OK
NEW	Blanchard	206	A	347.00	119.05	10.00	OK
Clayto	Clayton	257	A	85.58	196.51	31.00	OK
NEW	De Quincy	206	A	170.12	137.92	10.00	OK
KVDP	Dry Prong	206	A	92.52	107.12	10.00	OK
KTDY	Lafayette	260	C	131.61	238.71	226.00	OK
Lake C	Lake Charles	258	C	155.90	150.13	95.00	OK
KHLA	Lake Charles	258	C1	155.84	149.66	75.00	OK
KHLA	Lake Charles	258	C	155.90	150.13	95.00	OK
KAVK	Many	207	C3	116.99	23.61	12.00	OK
KLPI	Ruston	206	A	43.43	136.91	10.00	OK
KLPI	Ruston	206	C2	41.54	130.99	15.00	OK
KNBB	Ruston	257	C3	44.10	131.25	42.00	OK
KMJJFM	Shreveport	259	C2	353.57	108.92	106.00	Close
NEW	Sulphur	206	A	170.75	159.56	10.00	OK
NEW	Westdale	206	C3	5.43	79.95	12.00	OK
Vacant	Bogata	263	A	323.34	244.09	31.00	OK
KUST	Huntsville	259	C3	239.50	202.65	89.00	OK
KSHN	Liberty	260	C2	205.74	194.46	166.00	OK
KIXK	Linden	257	C2	330.37	190.25	55.00	OK
KUEZ	Lufkin	257	C2	256.89	109.28	55.00	OK
KMVLFM	Madisonville	263	C3	255.28	227.05	42.00	OK
KMOOFM	Mineola	260	A	304.57	218.82	115.00	OK
KGRI	Mt Enterprise	260	A	291.22	110.04	115.00	Short
Proposed in Docket 00-228 to change to 260A Zwolle, LA							
KYFP	Palestine	206	C2	281.87	200.68	15.00	OK
FA USE	Sulphur Bluff	259	A	319.95	253.93	72.00	OK
KDVE	Tatum	262	A	313.33	120.48	31.00	OK
KPYN	Atlanta	261	C2	346.95	184.81	106.00	OK
KBMA	Bryan	258	A	247.14	279.97	31.00	OK
KDETFM	Center	263	A	280.24	59.10	31.00	OK
KEOS	College Stn	206	A	247.40	283.61	10.00	OK
KEOS	College Stn	206	A	247.40	283.61	10.00	OK
Cor	Corrigan	261	A	238.06	133.02	72.00	OK
KILTFM	Houston	262	C	218.14	289.71	95.00	OK
KSBJ	Humble	207	C1	221.22	209.90	22.00	OK
KHMB	Hamburg	258	A	42.08	247.61	31.00	OK
KGPQ	Monticello	260	C3	36.38	289.12	142.00	OK
KMTB	Murfreesboro	258	C3	355.65	269.21	42.00	OK
KZHE	Stamps	263	C2	9.67	207.52	55.00	OK
NEW	Texarkana	207	C3	353.22	195.77	12.00	OK
NEW	Texarkana	207	C3	350.67	211.40	12.00	OK

# Exhibit E-I Page 12 Add260A Zwolle Area to Locate



## Exhibit E-I Page 13 KGRI Loss and Gain Areas

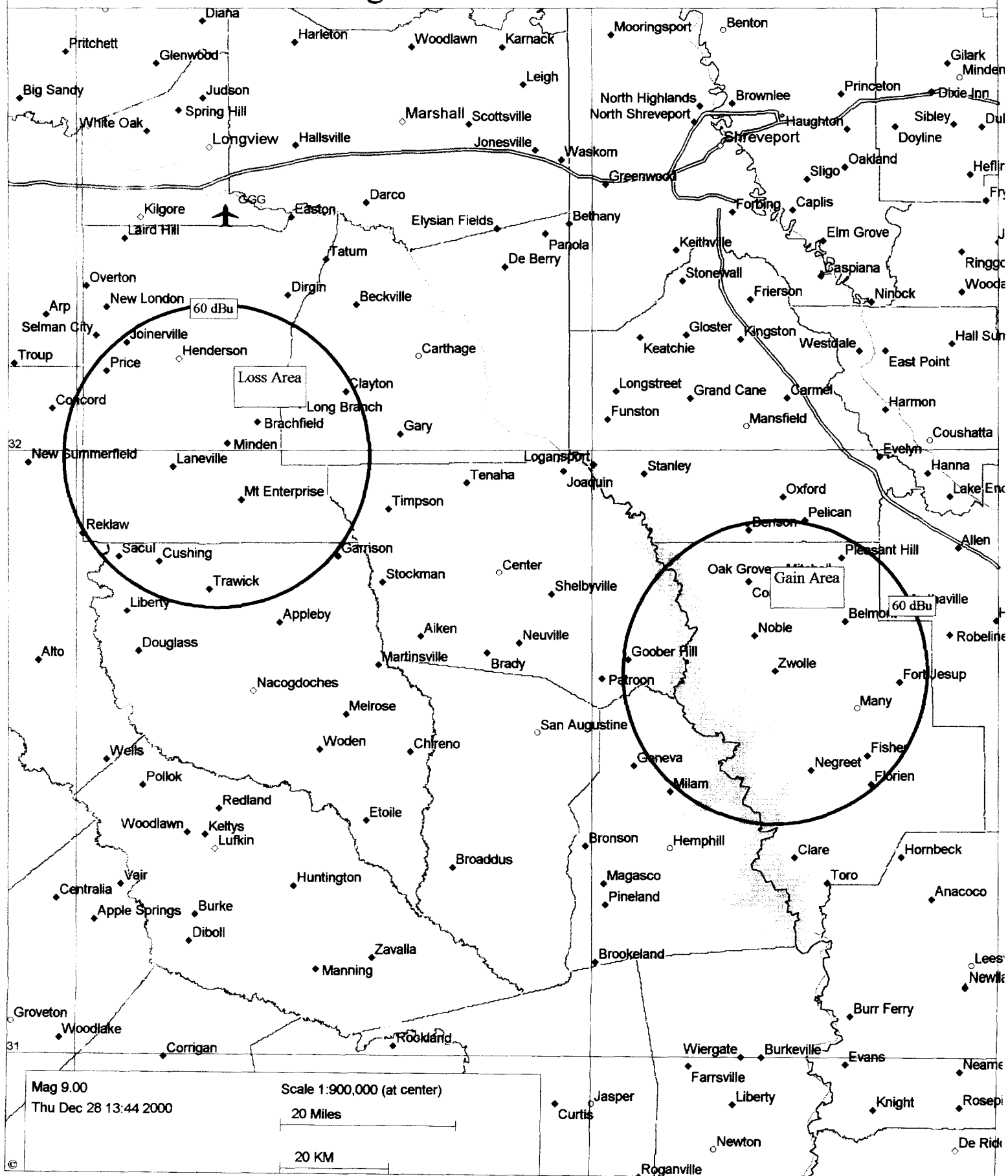


EXHIBIT E-I

Page 13a

Reynolds Radio, Inc.  
Add 260A Zwolle, LA

Stations providing service in loss area

KJCS Nacogdoches, TX	KTBQ Nacogdoches, TX
KLIS Palestine, TX	KWRW Rusk, TX
KPXI Overton, TX	KISX Whitehouse, TX
KGAS Carthage, TX	KLJT Jacksonville, TX
KDVE Tatum, TX	KYKS Lufkin, TX
KOOI Jacksonville, TX	KKTX Kilgore, TX
KYKX Longview, TX	KDET Center, TX
KAFF Diboll, TX	KUEZ Lufkin, TX
KYBI Huntington, TX	KTBB-AM Tyler, TX
KSFA-AM Nacogdoches, TX	KDET-AM Center, TX
KOFY Gilmer, TX	KWRD-AM Henderson, TX
KGAS-AM Carthage, TX	



EXHIBIT E-I

Page 13b

Reynolds Radio, Inc..  
Add 260A Zwolle, LA

Stations providing service in gain area

KYKS Lufkin, TX

KCOT San Augustine, TX

KSBH Coughatta, LA

KWLV Many, LA

KJVC Mansfield, LA

KORI Mansfield, LA

KTUX Carthage, TX

KPBL-AM Hemphill, TX

KWLA-AM Many, LA

KDET-AM Center, TX

KTXJ-AM Jasper, TX

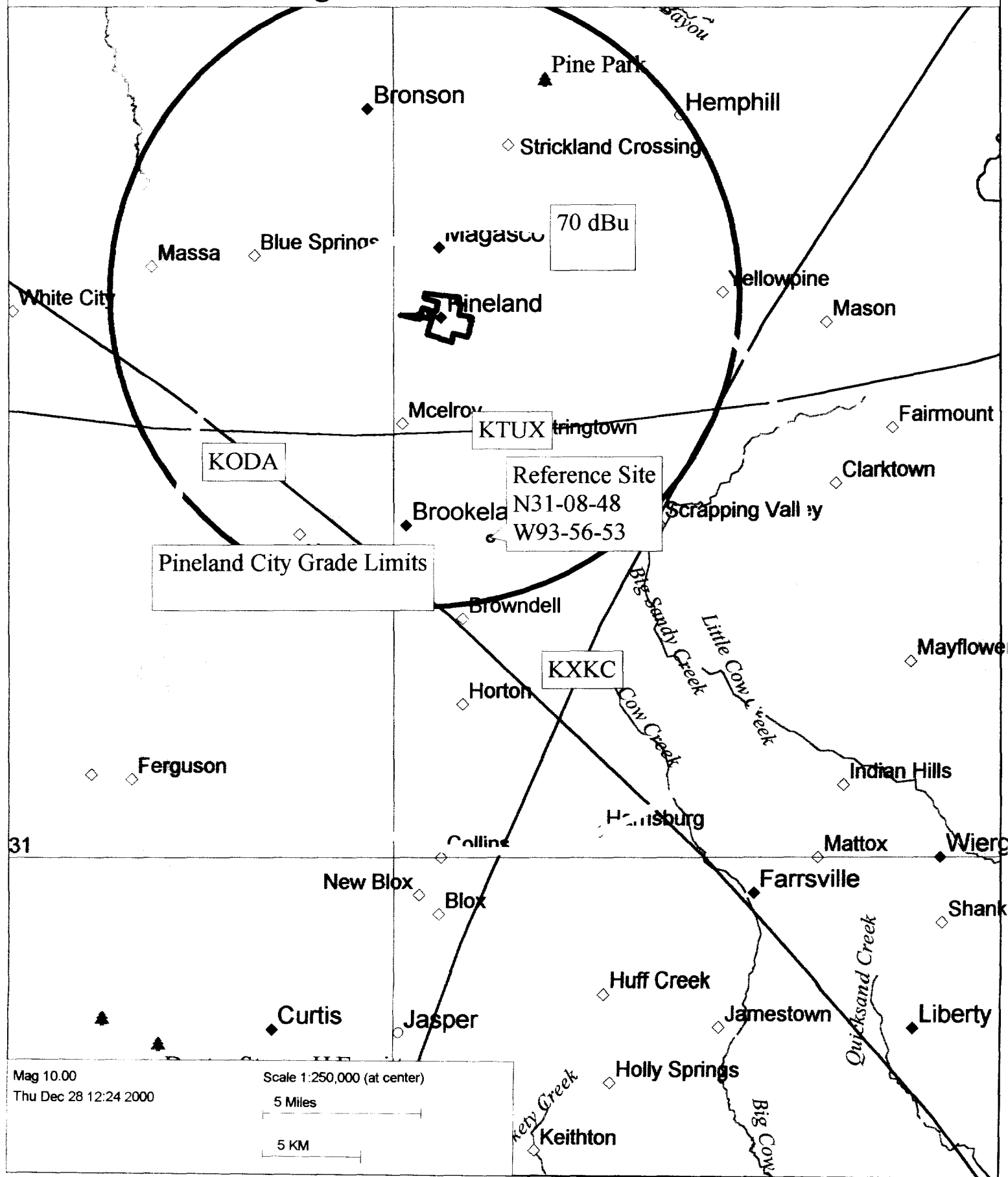
Exhibit E-I Page 15 Add 256A Pineland Allocation Study

Search Channel: 256  
Latitude: 310848

Class: A  
Longitude: 935653

Call Letters	Location	Channel	Class	Bearing	Distance(km)	Required(km)	OK/Short
Ref	Corrigan	257	A	257.64	85.90	72.00	OK
Proposed in Docket 00-228							
Clayto	Clayton	257	A	73.00	235.61	72.00	OK
NEW	Cotton Valley	203	C2	6.92	171.02	15.00	OK
NEW	Jonesboro	203	A	43.67	169.60	10.00	OK
Lake C	Lake Charles	258	C	132.61	123.04	95.00	OK
KHLA	Lake Charles	258	C1	132.46	122.66	75.00	OK
KHLA	Lake Charles	258	C	132.61	123.04	95.00	OK
KXKC	New Iberia	256	C	116.73	232.94	226.00	OK
KKST	Oakdale	254	C1	95.22	138.53	75.00	OK
Ringgo	Ringgold	253	C3	28.08	148.75	42.00	OK
KAPI	Ruston	202	A	38.12	198.11	10.00	OK
KAPI	Ruston	202	A	38.12	198.11	10.00	OK
KNBB	Ruston	257	C3	39.12	190.76	89.00	OK
KMJJFM	Shreveport	259	C2	5.83	162.82	55.00	OK
KAXF	Huntsville	202	C2	243.96	154.53	15.00	OK
KUST	Huntsville	259	C3	251.41	154.04	42.00	OK
KIXK	Linden	257	C2	343.33	228.74	106.00	OK
Proposed in instant counterproposal to upgrade to 257C1							
KUEZ	Lufkin	257	C2	290.42	82.98	106.00	Short
Proposed in Docket to change to 261C2							
NEW	Mt Vernon	202	A	332.23	255.27	10.00	OK
KTJM	Port Arthur	253	C	204.57	133.51	95.00	OK
FR ADD	Price	253	A	323.66	135.05	31.00	OK
NEW	Vidor	203	C3	180.25	117.36	12.00	OK
NEW	Vidor	203	C3	180.47	96.85	12.00	OK
NEW	Beaumont	203	C3	180.47	96.85	12.00	OK
NEW	Beaumont	203	C3	178.15	107.25	12.00	OK
KBMA	Bryan	258	A	256.53	236.09	31.00	OK
KTUX	Carthage	255	C1	357.19	137.87	133.00	Close
KAXF	Conroe	202	C2	243.96	154.53	15.00	OK
NEW	Crockett	203	A	277.83	146.73	10.00	OK
KNES	Fairfield	256	C3	286.18	219.22	142.00	OK
KNES	Fairfield	256	C3	286.74	206.02	142.00	OK
KODA	Houston	256	C	220.78	229.91	226.00	Close
KLBQ	El Dorado	254	C3	27.47	257.66	42.00	OK
Waldo	Waldo	256	A	13.12	256.15	115.00	OK
NEW	Waldo	256	A	16.59	251.85	115.00	OK

1



**CERTIFICATE OF SERVICE**

I, Janice Schechter, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 2<sup>nd</sup> of January 2001, a copy of the foregoing "Comments And Counterproposal" was mailed to:

Stephen W. Yates  
Station KUEZ  
121 Cotton Square  
Lufkin, Texas 75901

A handwritten signature in black ink, appearing to read "Janice Schechter", written in a cursive style.